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Attorneys for Defendant Google LLC (erroneously sued as Google Inc.)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

REPUBLICAN NATIONAL COMMITTEE,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Case No. 2:22-cv-01904-TLN-JDP

**STIPULATION AND [PROPOSED]
ORDER TO EXCEED PAGE
LIMITATIONS**

1 Plaintiff Republican National Committee (“Plaintiff”) and Defendant Google LLC
2 (“Defendant”; erroneously sued as “Google Inc.”) (collectively, the “Parties”), by and through
3 their undersigned counsel, hereby stipulate as follows:

4 1. WHEREAS, Defendant’s response to the Verified Complaint for Injunctive Relief,
5 Declaratory Judgment, and Damages (“Complaint”; Dkt. 1) is due January 23, 2023 (Dkt. 14);

6 2. WHEREAS, the Parties request permission to exceed the Court’s page limitations
7 for Defendant’s motion to dismiss, Plaintiff’s opposition brief, and Defendant’s reply brief;

8 3. WHEREAS, an extension is necessary so that the Parties may adequately address
9 the seven distinct claims for relief in the Complaint, including affirmative defenses to such
10 claims, under federal and California law;

11 4. WHEREAS, four of the seven claims, including Count III (Unfair Competition
12 Law), Count IV (intentional interference with prospective economic relations), Count V
13 (negligent interference with prospective economic relations), and Count VII (negligence) require
14 addressing numerous elements; and

15 5. WHEREAS, the Complaint is 28 pages, 114 paragraphs long, and contains
16 numerous citations to legal authorities, websites, and articles.

17 THEREFORE, the Parties respectfully request that the Court allow up to 30 pages for any
18 motion to dismiss and opposition briefs, and up to 15 pages for any reply brief.

19 **IT IS SO STIPULATED.**

1
2 Dated: January 9, 2023

PERKINS COIE LLP

3
4
5 By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

6 *Attorneys for Defendant Google LLC*
7 *(erroneously sued as Google Inc.)*

8 Dated: January 9, 2023

DHILLON LAW GROUP INC.

9
10 By: /s/ Thomas R. McCarthy

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19 Conor D. Woodfin (pro hac vice)

20 Counsel for Plaintiff Republican National
Committee

ATTESTATION

Concurrence in the filing of this document has been obtained from the individual whose electronic signature is attributed above.

By: /s/ Sunita Bali

Sunita Bali, Bar No. 274108

Attorneys for Google LLC (erroneously sued
as Google Inc.)

[PROPOSED] ORDER

The Court, having reviewed the Stipulation to Exceed Page Limitations, and good cause appearing, HEREBY ORDERS that for any motion to dismiss the Complaint, the following page limits shall apply: 30 pages for any motion to dismiss and opposition briefs and 15 pages for any reply brief.

IT IS SO ORDERED.

Dated: January __, 2023

Hon. Troy L. Nunley
United States District Judge

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record, via the Court's CM/ECF system on January 9, 2023, as follows:

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